

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA**

LORETTA O. BURKS,)	
)	
PLAINTIFF,)	
)	CIVIL ACTION NO.: 3:06-cv-383
VS.)	
)	
VANN'S FOOD MANAGEMENT, INC.,)	
d/b/a HUDDLE HOUSE, et al.,)	
)	
DEFENDANTS.)	

MOTION FOR LEAVE TO FILE AMENDED COMPLAINT

Comes Now **Plaintiff** and moves the court for an order granting her leave to file the First Amended Complaint which was electronically filed on August 21, 2006. As grounds for this motion, Plaintiff shows the following:

1. The First Amended Complaint adds the corporation that has been identified by the Defendant as the operator of the Huddle House where the accident occurred. It also states the claims against the defendants with greater specificity.
2. The First Amended Complaint was filed prior to the deadlines stated in the Planning Meeting Report for adding parties and amending the pleadings.

Respectfully Submitted,

/s/James H. Starnes

James H. Starnes, Attorney for Plaintiff

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that I have the foregoing pleading electronically using the CM/ECF system which will electronically serve a copy of same on all counsel of record on this the 23rd day of August, 2006 as follows:

S. Sanford Holliday
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/s/James H. Starnes

OF COUNSEL